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BY ECF

Honorable P. Kevin Castel
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: Rodriguez, et al., v. The City of New York, et al.,
21 CV 10815 (PKC)

Your Honor:

I am a Senior Counsel in the Office of Hon. Sylvia O. Hinds-Radix, Corporation Counsel of the City of New York, assigned to the defense of defendants City of New York, former Mayor Bill de Blasio, former Chief of Police Terence Monahan, former Police Commissioner Dermot Shea, former Assistant Chief Kenneth Lehr, Sergeant Kenneth Rice, Officer Khalid Khachfe, Detective Nelson Nin, Officer Raul Flores, and Detective Fred Dorch ("City defendants") in the above-referenced matter. The City defendants write in furtherance of the Court's Order dated May 31, 2023. Defendants are unable to identify the individuals identified in the Complaint as Does 82 and 86. Attached is the Affidavit of Laura M. Mulle, Director of the NYPD's Police Action Litigation Section, outlining the efforts made to identify Does 82 and 86.

Respectfully submitted,

Omar J. Siddiqi
Senior Counsel

cc: BY ECF
Elena Cohen. Esq.
Attorneys for Plaintiffs